



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 30, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Oklahoma Western Telephone Company
Study Area Code 432014**

Dear Ms. Dortch:

On behalf of Oklahoma Western Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Dean Pennello
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5805295000 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dean.pennello@hillcom.net
	Form Type	54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dean Pennello
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805295000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	432014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
432014ok510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	432014ok610.pdf

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

[illegible]

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net
<810>	Reporting Carrier	Oklahoma Western Telephone Company
<811>	Holding Company	Hilliary Acquisition 2016
<812>	Operating Company	Oklahoma Western Telephone Company

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

Choctaw Nation

<920> Tribal Government Engagement Obligation

432014ok920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

432014ok1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	432014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2024A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2025A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dean Pennello
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		432014ok3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	432014ok3026.pdf

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

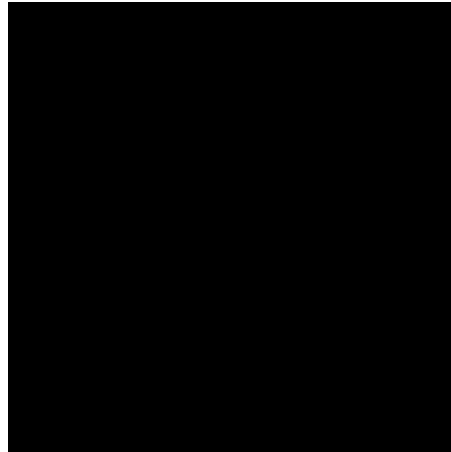
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
---	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
--	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039> Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039> Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>JSI</u>
Name of Reporting Carrier:	<u>OKLAHOMA WESTERN TEL</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/30/2017</u>
Printed name of Authorized Officer:	<u>Dean Pennello</u>
Title or position of Authorized Officer:	<u>CFO</u>
Telephone number of Authorized Officer:	<u>9185694111 ext.</u>
Study Area Code of Reporting Carrier:	<u>432014</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>OKLAHOMA WESTERN TEL</u>
Name of Authorized Agent Firm:	<u>JSI</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/30/2017</u>
Name of Authorized Agent Employee:	<u>Diane Longenecker</u>
Title or position of Authorized Agent or Employee of Agent	<u>Staff Director - Regulatory Affairs</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5123380473 ext.535</u>
Study Area Code of Reporting Carrier:	<u>432014</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Oklahoma Western Telephone Company

Study Area Code 432014

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband Service

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Oklahoma Western Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

Oklahoma Western Telephone Company

Study Area Code 432014

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Oklahoma Western Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dean Pennello
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805295000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	18.13

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dean Pennello
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805295000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432014
<015>	Study Area Name	OKLAHOMA WESTERN TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dean Pennello
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805295000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dean.pennello@hillcom.net

<810>	Reporting Carrier	Oklahoma Western Telephone Company
<811>	Holding Company	Hilliary Acquisition 2016
<812>	Operating Company	Oklahoma Western Telephone Company

[illegible]

Oklahoma Western Telephone Company

Study Area Code 432014

Response to Line 920- Tribal Engagement Obligation

Oklahoma Western Telephone Company (“Company”) serves the Choctaw Nation located in southeast Oklahoma. The Company reached out to the Choctaw Nation to initiate discussion of the Choctaw Nation’s needs assessment and deployment planning, feasibility and sustainability planning, culturally-sensitive marketing methods, land use processes and compliance with Tribal business requirements per of 47 C.F.R. §54.313(a)(9). The Company has attached a written statement to evidence its communication with the Choctaw Nation in 2016.

The Choctaw Nation has been named one of President Obama’s “Promise Zones,” requiring the Choctaw Nation to partner with local entities to bring economic opportunity to the area. The Company looks forward to continuing to work with the Choctaw Nation to advance its goals, by continuing to bring advanced telecommunications services and broadband services to all individuals and small businesses within the Company-served areas of the Choctaw Nation.

OKLAHOMA WESTERN TELEPHONE COMPANY
102 EAST CHOCTAW PO BOX 399
CLAYTON, OKLAHOMA 74536
(918)569-4111

June 10, 2016

Choctaw Nation of Oklahoma
Attn: Chief Gary Batton
529 N 16th Ave
Durant, OK 74701

Re: Request for meeting to discuss the communication needs of your Tribal Community

Dear Chief Batton,


As required by the FCC, regarding Oklahoma Western Telephone Company, we would like to request a meeting to make sure that the communication needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this I would like to have a meeting with you and/or others you designate to discuss a needs assessment and deployment planning for the communications needs of your Tribal members and Tribal government institutions. Oklahoma Western Telephone Company is not only the authorized telecommunications provider for some of your Tribal lands but our company provides a full array of communications services, including broadband services, internet access and voice telephone service.

I would like to discuss, at a minimum, the following areas:

1. The communications needs of Tribal Community anchor institutions.
2. Feasibility and sustainability planning for your communication needs.
3. Marketing of our services to Tribal members
4. Right of way issues, if any, associated with our provisioning of services to tribal members and/or institutions operated by the Nation.

5. Our compliance with Tribal business and licensing requirements, if any.
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we select the time and location that will best fit with your schedule.

A handwritten signature in cursive script, appearing to read "Pauline Van Horn".

Pauline Van Horn
Oklahoma Western Telephone Company
918-569-4111
Pvanhorn.owtc@gmail.com

Oklahoma Western Telephone Company

Study Area Code: 432014

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Oklahoma Western Telephone Company's tariff(s) on file with the Oklahoma Corporation Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates are provided in Line 700 included herein this ETC Annual Report. The residential local service rates listed in Line 700 do not include all mandatory taxes, fees and surcharges, including, but not limited to, state and local taxes, 9-1-1 fees and municipal franchise fees. Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

1st Revised Page 1

LIFELINE SERVICE

14.093t

I. Applicability

AT

1. Lifeline Service is a voice telephony service assistance program designed to provide eligible residential customers with a credit to be applied to the price of Residential voice telephony service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their Residential voice telephony service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential voice telephony services or locations the customer receives service within the State of Oklahoma.
4. Lifeline Service shall not be available on a retroactive basis.

II. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. voice telephony services that provide voice grade access to the public switched network or its functional equivalent;
2. minutes of use for local service provided at no additional charge to end users;
3. access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and
4. toll limitation services to qualifying low-income consumers as provided in 47 CFR §54.400.

III. Eligibility Requirements for Lifeline Service On Non-Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

AT

Lifeline service may not be disconnected for non-payment of toll charges.

Public Utility Division
201400093t
Tariff Sheets Approved
per 165:55-5-10(c)
Issued: 10-31-14

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

2nd Revised Page 2

LIFELINE SERVICE

III. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)

- a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Veterans and Survivors Pension Benefit; or

(RT)(AT)

- b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size.

(RT)

2. In addition to meeting the qualifications provided in paragraphs a. through b. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.
3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.

Public Utility Division
201600132
Tariff Sheets Approval
per 165;55-5-10(c)

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

3rd Revised Page 3

LIFELINE SERVICE

III. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)

5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

Lifeline Credits for Lifeline Service On Non-Tribal Lands

Monthly Credit

Federal Lifeline Credit:

\$9.25 (CP)(FC)

Public Utility Division
201600132
Tariff Sheets Approval
per 165:55-5-10(c)

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

4th Revised Page 4

LIFELINE SERVICE

IV. Eligibility Requirements for Lifeline Service On Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Veterans and Survivors Pension Benefit; or

(RT)(AT)

b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or

(RT)

c. A customer who lives on Tribal lands is eligible for Lifeline service as a "qualifying low-income consumer" as defined by 47 CFR § 54.400(a) and as an "eligible resident of Tribal lands" as defined by 47 CFR § 54.400(e) if that customer meets the qualifications for Lifeline specified in paragraphs a. through e. above or if the customer, one or more of the customers dependents, or the

Public Utility Division
201600132
Tariff Sheets Approval
per 165:55-5-10(c)

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

5th Revised Page 5

LIFELINE SERVICE

IV. Eligibility Requirements for Lifeline Service On Tribal Lands (continued)

customers household participates in one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs general assistance; Tribally administered Temporary Assistance for Needy Families; Head Start (only those households meeting its income qualifying standard); or the Food Distribution Program on Indian Reservations.

2. In addition to meeting the qualifications provided in paragraphs a. through e. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.
3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.
5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

Lifeline Credits for Lifeline Service On Tribal Lands

Monthly Credit

Federal Lifeline Credit: \$34.25 (CP)(FC)

Public Utility Division
201600132
Tariff Sheets Approval
per 165:55-5-10(c)

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

Second Revised Page 6

LIFELINE SERVICE

VI. Lifeline Credits on Tribal Lands (Continued)

DT

- B. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelines or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows:

AT

Monthly Credit ⁽³⁾

Federal Lifeline Credit:

\$9.25

CR

Additional Federal Credit to Residential Access Line
necessary to reduce customer's bill to \$1.00 (See footnote (4) below)

DT

- (3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c)

Effective: 8-1-2012

Public Utility Division
201200197
Competitive Service Filing

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

First Revised Page 1

Link Up America Assistance for Initiating Service

I. Applicability

Reserved for future use

(RT)

Public Utility Division
201600132
Tariff Sheets Approval^(RT)
per 165:55-5-10(c)

OKLAHOMA WESTERN TELEPHONE COMPANY
Clayton, OK 74536

Third Revised Page 2

Link Up America Assistance for Initiating Service (Continued)

IV. Link Up America -- On Tribal Lands

- A. The Link Up America on Tribal Lands program is available to eligible applicants who certify residence on tribal lands as defined in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v). ⁽¹⁾
- B. The applicant or customer seeking to obtain Link Up Service on Tribal Lands credits must demonstrate their current eligibility for Lifeline on Tribal Lands as defined in this tariff. (RT)(AT)

(RT)

|

(RT)

- C. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60 years of age.
- D. The applicant must also certify agreement to notify the Company if the applicant no longer participates in the program or programs described in paragraph 2, above, for which the Applicant certified their participation in.
- E. The service installation charge, as described elsewhere in this tariff, will be a 100% reduction up to \$100.00, including any facilities based charges associated with the extension of lines or construction of facilities needed to initiate service.
- F. The discount will not apply to charges for facilities or equipment on the customer side of the demarcation point.

(1) The Company shall have no responsibility for the certification of applicants or customers eligibility.

Public Utility Division
201600132
Tariff Sheets Approval
per 165:55-5-10(c)

Oklahoma Western Telephone Company

Study Area Code 432014

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Oklahoma Western Telephone Company (“Company”) hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY